



**Chairperson: Bob Wyatt, NW Natural**  
**Treasurer: Frederick Wolf, DBA, Legacy Site Services for Arkema**

March 25, 2015

Kristine Koch  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, M/S ECL-115  
Seattle, Washington 98101-3140

**Re: LWG Comments on Revised FS Section 2 (Lower Willamette River, Portland Harbor  
Superfund Site, USEPA Docket No: CERCLA-10-2001-0240)**

Dear Ms. Koch:

This submittal (with attachments) transmits the LWG's technical comments on revised FS Section 2. EPA provided its proposed revised Section 2 of the FS to the LWG for review on February 23, 2015. Per the revision process provided by EPA on December 17, 2014, the LWG has 30 days to review each FS section and identify any technical issues with the text, tables, and figures EPA has drafted. The LWG and the EPA RPM now have 15 days to resolve issues on this section, although EPA may grant additional time on a case-by-case basis.

This input is part of the LWG's and EPA's efforts to reach consensus and develop a technically sound revised FS. The comments provided herein, while certainly addressing many of the most important issues that have become apparent from the LWG's 30-day review of draft FS Section 2 and recent discussions with EPA, may not be comprehensive but are submitted now so as to comply with the FS review process.

In general, as explained in detail in our comments and our meeting with EPA on March 17, 2005, the LWG has significant concerns about EPA's overall vision for revising the FS based on EPA's draft FS Section 2. For example, based on our recent Section 2 discussions, EPA generated PRGs with little or no apparent consideration of risk management principles and significantly modified previously agreed-upon RAO text. We strongly encourage EPA to apply risk management principles now to ensure that achievable remediation goals are selected consistent with the NCP and EPA's sediment remediation guidance.

We sincerely hope this information will be valuable to EPA as it undertakes the process of developing its final directions for changes to FS Section 2. We and our consultants remain available to discuss with EPA any issue we have raised here.

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Sincerely,



Bob Wyatt

cc: Sean Sheldrake, U.S. Environmental Protection Agency, Region 10  
Confederated Tribes and Bands of the Yakama Nation  
Confederated Tribes of the Grand Ronde Community of Oregon  
Confederated Tribes of Siletz Indians of Oregon  
Confederated Tribes of the Umatilla Indian Reservation  
Confederated Tribes of the Warm Springs Reservation of Oregon  
Nez Perce Tribe  
Oregon Department of Fish & Wildlife  
United States Fish & Wildlife  
Oregon Department of Environmental Quality  
LWG Legal  
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